

Exhibit 2

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NATIONAL ASSOCIATION OF
SCHOLARS,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
ENERGY, JENNIFER GRANHOLM in her
official capacity as Secretary of Energy, and
GERALDINE RICHMOND, in her official
capacity as Under Secretary for Science and
Innovation,

Defendants.

Case No. 25-cv-00077

DECLARATION OF PETER WOOD

I, Peter W. Wood, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would competently testify the same.

2. I am resident of New York, and have been so for the past 12 years.

3. I have been a member of the National Association of Scholars (“NAS”) for 17 years and am currently the President of the NAS and have been so for the past 15 years.

4. From 2007 to 2008, I served as the Executive Director of NAS, and I served as the provost of King’s College in New York City from 2005 to 2007.

5. I was a tenured faculty member of the Anthropology Department at Boston University for over 9 years, and also served in a variety of administrative positions, including associate provost.

6. I received a bachelor’s degree in 1975 from Haverford College, and a Master’s in Library Science from Rutgers University in 1977. I received a Ph.D. in anthropology in 1987 from the University of Rochester.

7. In addition to scholarly research and publications, I frequently publish opinion pieces in publications such as the Wall Street Journal and Chronicle of Higher Education.

8. The NAS is a 501(c)(3) tax-exempt organization with over 3000 members that seeks to reform higher education.

9. I am intimately familiar with the mission and goals of the NAS, which is the uphold the traditional standards of a liberal arts education that fosters intellectual freedom, searches for truth, and promotes virtuous citizenship.

10. In pursuit of its mission, the NAS defends academic freedom of faculty members, students, and others through issue advocacy, investigative research, and the publication of a quarterly journal and reports that highlight issues pertaining to higher education. NAS also engages in litigation to defend the freedom of speech and conscience of educators and students, including submitting amicus briefs in court cases.

11. An area that the NAS has focused attention and resources is the expansion of Diversity, Equity and Inclusion (“DEI”) within college and university campuses over the past several years. NAS believes that DEI is an vague and ill-defined ideology that results in individuals being treated as a member of groups, and imposes a hierarchy of victims and oppressors based race, gender, and sexual orientation.

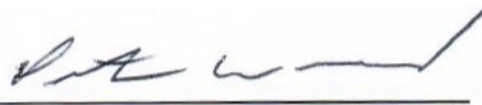
12. NAS opposes DEI programs and requirements within higher education, such as mandatory DEI statements for faculty job applicants or requiring mandatory DEI statements for tenure or promotion, because it believes that DEI is counter to the mission and goals of the NAS. NAS opposes DEI programs and requirements in higher education because it believes that they undermine academic freedom and are counter to academic excellence and individual merit and achievement.

13. Over the past five years, NAS has conducted research and published reports critical of DEI efforts within higher education and continues to advocate for discontinuing DEI programs and requirements within higher education. NAS continues to advocate for the elimination of DEI programs and requirements within academia, including the requirement of DEI statements for obtaining faculty positions or research grant funding.

14. When given the opportunity, NAS submits comment letters or pursues other forms of advocacy to oppose DEI programs or requirements in higher education.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 17, 2024, in New York City, New York.



Peter W. Wood